

GORDON & SILVER, LTD.
DOMINIC P. GENTILE
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Attorneys for IAN MENDELSON

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

vs.

IAN MENDELSON

Defendant.

CASE NO. 2:07-CR-043-KJD-PAL

**DEFENDANT IAN MENDELSON'S EMERGENCY MOTION FOR
MODIFICATION OF CONDITIONS TO PERMIT INTERNATIONAL TRAVEL**

COMES NOW the Defendant, Ian Mendelsohn, by and through his attorney, Dominic P. Gentile, Esq., of the law firm of Gordon & Silver, Ltd., and respectfully moves this Honorable Court for an Order granting Ian Mendelsohn permission to travel to Spain for the purpose of his honeymoon. This motion is based upon the records and files of this case, Ian Mendelsohn's performance on pre-trial release, the attached Affidavits of counsel in accordance with Federal Rule of Criminal Procedure 47 and, the exhibits attached hereto.

1. On March 7, 2007, Ian Mendelsohn (hereinafter "Ian") was indicted with one count of Coercion and Enticement in violation of 18 U.S.C. §2422(b). He was released on his own recognizance on March 22, 2007 with several conditions; however the condition relevant to this Motion is the requirement that Ian participate in a home confinement program component. This was to include electronic monitoring or other location verification system, as well as

1 comply with curfew as directed by Pre-trial Services. On June 27, 2007, the Court upon the
2 request of U.S. Pre-trial Services added the condition of Ian participating in the home detention
3 component of the home confinement program. See Order – Document 18.

4 2. Currently, as a result of the pre-trial condition of the home confinement program,
5 Ian wears an ankle bracelet and complies with a curfew that is decided on by his Pre-trial
6 Services Officer¹ usually on a weekly basis².

7 3. On April 5, 2008, Ian will marry his long time girlfriend, Susan Gogel.

8 4. Ms. Gogel as a result of her employment as a Primary Care Representative for
9 TAP Pharmaceutical Products Inc. has received the Saiyushu (Most Excellent Player in English)
10 award. See Exhibit 1. Other employees in her company have also been awarded similar honors.
11 As a reward, TAP Pharmaceutical has planned a trip to Barcelona and Madrid Spain for all the
12 employees that won such honors. See Exhibit 2.

13 5. This trip is a once in a lifetime opportunity for Ian and Ms. Gogel as the trip is
14 completely paid for and will act as their honeymoon after their April 5th marriage.

15 6. The TAP trip is from April 13, 2008 – April 19, 2008. See Exhibit 2.

16 7. On Saturday, April 12, 2008, the TAP group will leave the United States and
17 arrive at Madrid Barajas International Airport, on Sunday, April 13, 2008. See Exhibit 2.

18 8. While in Madrid, the TAP group will be staying at Westin Palace Madrid located
19 at Plaza de las Cortes, 7, 28014 Madrid, Spain from August 13-16, 2008. The phone number for
20 the hotel is (from US dial) 011-34-91-360-8000. See Exhibit 2.

21 9. They will leave from Madrid to Barcelona on Wednesday, April 16, 2008 and will
22 be staying at Hotel Arts Barcelona, Marina, 19-21, 08005 Barcelona, Spain until April 19, 2008.
23 The phone number for the hotel is (from US dial) 011-34-93-221-1070. See Exhibit 2.

24 10. On the 19th of April, the TAP group will leave Barcelona and return to the United
25

26 ¹ Pre-trial Officer Sandra Bustos monitors Ian's behavior as the case is a District of Nevada case; however, since Ian
resides in Baltimore, Maryland, Pre-trial Officer Ken Langston directly supervises Ian in his home state.

27 ² Ian must comply with a curfew on a daily basis. However, Ian is able to submit weekly requests based on work
28 events to both Officer Bustos and Langston. Based on those events, the curfew at times is enlarged; however,
usually not exceeding 1:00a.m.

1 States on this same day. See Exhibit 2. Therefore, Ian and Ms. Gogel will return to Baltimore,
2 Maryland on said date.

3 11. There is a detailed schedule of events for the several days that Ian and Ms. Gogel
4 will be in Spain. See Exhibit 3.

5 12. Ms. Gogel must notify her employer of her intention to take the trip by March 14,
6 2008, thus the reason for the title of said "emergency" motion.

7 13. Ian has been on pre-trial release for almost an entire year with no serious
8 infractions.

9 14. Prior to the federal charges and being placed on pre-trial release, Ian was a defendant
10 in State of Nevada v. Ian Mendelsohn. In the State case, Ian was placed on bond on March 7,
11 2006. The case was ultimately dismissed as a result of the federal authorities indicting Ian. This
12 shows that Ian has remained trouble free for approximately 2 years in total. Prior to the Nevada
13 State charges, Ian had no prior criminal history.

14 15. Ian has significant ties to his community, Baltimore, Maryland. His entire family
15 resides there and has resided there for generations. He has a fiancé, who is soon to become his
16 wife, who just recently bought a house in the Baltimore area. They plan to start a family and
17 raise their family in this area. See Exhibit 4 - Letter from Rabbi Steve Schwartz. Ian also runs
18 the family business, I.M. Wine. Further, he and his family are extremely connected to the local
19 synagogue and attend religious services consistently. See Exhibit 4.

20 16. Furthermore, Ian appeared voluntarily and surrendered himself, when the
21 indictment in the federal case was filed. Based on Ian's significant ties to the Baltimore
22 community and his attending the first court proceeding in the District of Nevada on his own
23 volition, Ian is not a flight risk.

24 17. Ian is also not a danger to the community. Ian has been under the psychiatric
25 consultation of Dr. Roger Lewin since May 26, 2006. See Exhibit 5 -- Letter from Dr. Roger
26 Lewin, M.D. Dr. Lewin provides treatment for Ian on a weekly basis. See Exhibit 5. Based on
27 Dr. Lewin's treatment of Ian, he believes that there are no indications of pedophilia or of Ian
28 being a sexual predator. See Exhibit 5.

18. Dr. Fred Berlin, M.D., Ph.D, the founder of the John Hopkins Sexual Disorders Clinic and Director of the National Institute for the Study, Prevention and Treatment of Sexual Trauma has also been treating Ian since April 17, 2007. See Exhibit 6 – Letter from Dr. Fred S. Berlin, M.D., Ph.D. Based on his treatment of Ian, he does not believe that Ian is a risk to children or to anyone else in the community. See Exhibit 6.

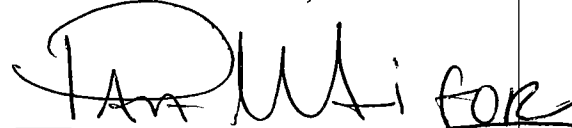
19. Counsel Dominic Gentile spoke to Assistant United States Attorney, Nancy Koppe on February 26, 2008 and she is objecting to Ian's traveling to Spain based on the requirement that Ian be on electronic monitoring.

20. Counsel Paola Armeni attempted to call Pre-trial Services Officer, Sandra Bustos to obtain Pre-trial Services position, but has not been able to speak directly to Officer Bustos as of the filing of this motion. A supplement will be filed when Pre-trial Services position is known.

WHEREFORE, for the foregoing reasons, it is respectfully requested that the Court enter an order permitting Ian Mendelsohn to be released from the home confinement program component for purposes of going to Spain on his honeymoon, and that he will voluntarily return to home confinement by the late evening of April 19, 2008.

DATED this 28th of February, 2008.

GORDON & SILVER, LTD.



DOMINIC P. GENTILE
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3960 Howard Hughes Pkwy., 9th
Floor
Las Vegas, Nevada 89169
(702) 796-5555
(702) 369-2666 (Facsimile)
Attorneys for IAN MENDELSON

AFFIDAVIT OF DOMINIC P. GENTILE

STATE OF NEVADA)

COUNTY OF CLARK)

I, DOMINIC P. GENTILE, having first been duly, do depose and state that:

1. I am a duly licensed attorney retained to represent the Defendant Ian Mendelsohn in the above-captioned matter.

2. Ian is currently on pre-trial release under the supervision of United States Pre-trial Officer, Sandra Bustos in the District of Nevada, and directly supervised by Ken Langston, Pre-trial Officer in the District of Maryland.

3. As a condition of pre-trial release, this Honorable Court has ordered that Ian participate in the home confinement program component. Currently, Ian wears an ankle bracelet to monitor his whereabouts and also complies with a curfew that is imposed by his pre-trial officer.

4. Ian has been supervised by pre-trial services for almost a year with no serious infractions.

5. Prior to his being indicted in the federal case, Ian was a defendant in State of Nevada v. Ian Mendelsohn, as a result of similar accusations. Ian was placed on bond in March of 2006, and therefore allowed to go back to Maryland, where he remained trouble free and has continued to remain trouble free. As a result of the federal indictment, the case in the State court was dismissed.

6. Ian appeared voluntarily and surrendered himself just before his first appearance in United States District Court, District of Nevada after learning that the federal government indicted him.

7. Prior to Ian's initial arrest in 2006, Ian had no prior criminal history,

8. Ian currently resides in Baltimore, Maryland with his fiancé, Susan Gogel, who recently bought a house so that they can start a family. Ian's entire family resides in Baltimore, and has resided for several generations.

9. Ian also runs the family business, I.M, Wine in Baltimore, Maryland.

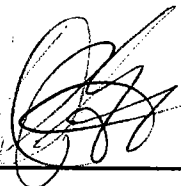
10. Based on Ian's significant ties to the Baltimore community, his attending the first court proceeding in the District of Nevada on his own volition and my understanding that Ian has been compliant with pre-trial supervision with no serious infractions, I believe that Ian is not a flight risk and if allowed to travel to Spain, would return to the United States.

11. Paola M. Armeni is one of my associates who are working directly with me on Ian's matter.

12. Ms. Armeni informed me that Ian and Susan Gogel were planning to wed and that Susan had won a trip to Spain as a result of her employment. Due to this fortunate event, Ian and Susan wanted to use this trip for their honeymoon.

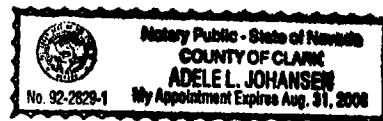
13. As a result of my conversations with Ms. Armeni, I contacted, Assistant United States Attorney, Nancy Koppe on February 26, 2008 regarding her position on Ian's request to travel. Ms. Koppe stated that due to the requirement of the electronic monitoring she would have to oppose said motion.

FURTHER affiant sayeth naught.



DOMINIC P. GENTILE, Affiant

SUBSCRIBED and SWORN to before me
this 28th day of February, 2008.



NOTARY PUBLIC in and for said County
and State

AFFIDAVIT OF PAOLA M. ARMENI

STATE OF NEVADA)
)
COUNTY OF CLARK)

I, PAOLA M. ARMENI, having first been duly, do depose and state that:

1. I am a duly licensed attorney retained to represent the Defendant Ian Mendelsohn with Dominic P. Gentile in the above-captioned matter.

2. Ian Mendelsohn and Susan Gogel plan to wed on April 5, 2008.

3. Ms. Gogel as a result of her employment as a Primary Care Representative for TAP Pharmaceutical Products Inc. has received the Saiyushu (Most Excellent Player in English) award. See Exhibit 1. Other employees in her company have also been awarded similar honors. As a reward, TAP Pharmaceutical has planned a trip to Barcelona and Madrid Spain for all the employees that won such honors. See Exhibit 2.

4. This trip is a once in a lifetime opportunity for Ian and Ms. Gogel as the trip is completely paid for and will act as their honeymoon after their April 5th marriage.

5. I have reviewed all the documents from TAP Pharmaceutical Products Inc. regarding the trip to Spain. The details include the following:

- a. The TAP trip is from April 13, 2008 – April 19, 2008. See Exhibit 2.
- b. On Saturday, April 12, 2008, the TAP group will leave the United States and arrive at Madrid Barajas International Airport, on Sunday, April 13, 2008. See Exhibit 2.
- c. While in Madrid, the TAP group will be staying at Westin Palace Madrid located at Plaza de las Cortes, 7, 28014 Madrid, Spain from August 13-16, 2008. The phone number for the hotel is (from US dial) 011-34-91-360-8000. See Exhibit 2.
- d. They will leave from Madrid to Barcelona on Wednesday, April 16, 2008 and will be staying at Hotel Arts Barcelona, Marina, 19-21, 08005 Barcelona, Spain until April 19, 2008. The phone number for the hotel is

(from US dial) 011-34-93-221-1070. See Exhibit 2.

e. On the 19th of April, the TAP group will leave Barcelona and return to the United States on this same day. See Exhibit 2. Therefore, Ian and Ms. Gogel will return to Baltimore, Maryland on said date.

f. There is a detailed schedule of events for the several days that Ian and Ms. Gogel will be in Spain. See Exhibit 3.

6. I have been informed by Susan Gogel that she must notify her employer of her intention to take the trip by March 14, 2008, thus the reason for the title of said "emergency" motion.

7. As a result of Ian's request for travel, I asked him to contact Dr. Lewin and Dr. Berlin regarding their feelings on Ian being able to travel, specifically if they believe after their treatment of him whether he is either a flight risk or more importantly a danger to the community.

8. I spoke to both Dr. Lewin and Dr. Berlin personally either via e-mail or telephonically regarding the letters to the Court and what issues they needed to address, specifically their opinion of whether Ian was a flight risk or a danger to the community. As a result they submitted letters. See Exhibits 5 and 6.

9. I also received an e-mail from Rabbi Schwartz providing information on Ian's ties to the Baltimore community. See Exhibit 4.

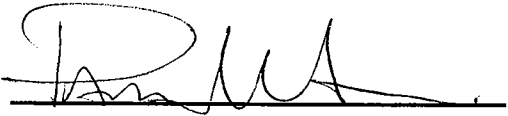
10. It is my belief based on my knowledge of Ian's ties to his community and my conversations with the doctors who are treating Ian that Ian is neither a flight risk nor a danger to the community. As such, if Ian was permitted to travel to Spain for his honeymoon, he would not be a threat to the community or a risk of not returning to the United States.

11. I spoke to Dominic Gentile regarding Ian and Susan's upcoming wedding, Susan winning the trip through work and their desire to use said trip as their honeymoon.

12. On February 26, 2008, I contacted Pre-trial Officer, Sandra Bustos regarding her position on Ian's request to travel. I left a voice message. On February 27, 2008, Officer Bustos left me a voice message. At the filing of said motion, I have been unable to speak to Officer

1 Bustos regarding her position. I will supplement said Motion as soon as her position is known.

2 **FURTHER** affiant sayeth naught.

3
4 

5 PAOLA M. ARMENI, Affiant

6
7
8 **SUBSCRIBED and SWORN** to before me
9 this 28th day of February, 2008.

10
11 

12 **NOTARY PUBLIC** in and for said County
13 and State



EXHIBIT "1"

Awards *2007* *Program*

PSR-Blue Team



TAP PHARMACEUTICAL PRODUCTS INC.

Ladies and Gentlemen:

There is no greater honor than to have your achievements recognized by your TAP colleagues. I am pleased to present TAP's 2007 Awards Program. I encourage you to take the time to review all of the awards outlined in this publication to understand the recognition opportunities available at TAP.

Best wishes to each of you and may your efforts take you to a performance level that exceeds your imagination.

Sincerely,

A handwritten signature in black ink that reads "Noreen Matthews". The signature is written in a cursive style with a large, stylized 'M'.

Noreen Matthews

Director, Sales Operations

EXHIBIT "2"



Will Hall – Saiyushu Award

This award recognizes our former Vice President of Sales, Will Hall, who embodied the spirit of "Saiyushu", which means "Most Excellent Player" in Japanese. This is a semi-annual award presented to the top performers in their respective district or region based on the specified criteria. The winners will receive an engraved jade crystal piece.

Will Hall – Saiyushu Award

PSR Blue Team

The Saiyushu Award for each semester is determined based on the sum of two weighted quarterly ranks and is ranked at a district level.

There are two performance criteria:

- ❖ Prevacid Volume Increase - weight 50%
- ❖ Prevacid Market Share Increase - weight 50%

The two weighted ranks will be summed to determine the quarterly rank. The two quarterly ranks will be summed and the lowest combined rank in the district will be eligible to receive the Saiyushu Award for the semester.

Increases are measured on current quarter performance compared to the current quarter base period.

Quarterly Tie Breaker: Current Quarter Prevacid Market Share Increase

Semester Tie Breaker: Average of two quarterly tie breakers calculated as stated above

Program is subject to change at the discretion of Sales Management.

PSR District Managers

The Saiyushu Award for each semester is determined based on the sum of two weighted quarterly ranks and is ranked at a regional level.

There are two performance criteria:

- ❖ District Prevacid Volume Increase - weight 50%
- ❖ District Prevacid Market Share Increase - weight 50%

The two weighted ranks will be summed to determine the quarterly rank. The two weighted quarterly ranks will be summed and the lowest combined rank in the region will be eligible to receive the Saiyushu Award for the semester.

Increases are measured on current quarter performance compared to the current quarter base period.

Quarterly Tie Breaker: District Current Quarter Prevacid Market Share Increase

Semester Tie Breaker: Average of two quarterly District tie breakers calculated as stated above

*Semester One is from 1/1/07-6/30/07
Semester Two is from 7/1/07-11/30/07*

February 15, 2008

Congratulations! It is my pleasure to provide you with information pertaining to our Excalibur Trip to Madrid and Barcelona - Si Spain! The following information will assist you and your guest in planning your trip.

Airline call-in will **NOT** begin at this time. Please refrain from calling and emailing The Meeting Group regarding airline ticketing until a separate communication is provided. In the interim, the following travel information has been provided for your review.

PROGRAM DATES

The official program dates are Sunday, April 13 to Saturday, April 19, 2008. You will leave the USA on Saturday, April 12 and arrive at the Madrid Barajas International Airport on Sunday, April 13, 2008. You will travel from Madrid to Barcelona on Wednesday, April 16. Departures from Barcelona will be on Saturday, April 19, 2008 and you will arrive back in the USA on the same day. If you have destination questions, please contact Colette Butkus, of The Meeting Group, at 847-317-1280, from 8:30 a.m. - 5:00 p.m. CST.

AIRLINE TICKETS

You will receive an email later this month indicating when to begin making your air travel arrangements. Please do **NOT** call The Meeting Group until this email communication is received.

Prior to calling The Meeting Group to make your travel arrangements, please discuss your travel plans with your guest. If you plan to redeem frequent flier miles for upgrades or free tickets, please call the airline to confirm that sufficient miles are available in your account and to see on which flights your miles can be redeemed. ***Please note we cannot guarantee that you will travel on your preferred airline due to booking the most economical airfares available. If a preferred airline is requested, any additional cost would be a personal expense.*** Some fares may not be upgradeable. If you would like an upgradeable fare, the difference will be at your own expense.

Prior to final ticketing, please make sure your itinerary meets the travel needs of both you and your guest. Changes are costly and will not be accommodated except in extenuating circumstances and only with Sales Operations' approval. In addition, please be sure to read the TAP Personal Travel Policy found on the last page of this email. Airline tickets provided by TAP for company group travel may not be purchased on-line.

The names on your ticket and your guest's ticket must be the same as they appear on your passports.

Tickets and additional information will be mailed to reach you the week of March 31, 2008. If you do not receive your tickets and information by April 4, please call The Meeting Group at 800-566-2233, Monday through Friday, 8:30 am - 5:00 pm CST. *Please be sure to bring your passports, tickets and information with you to the airport on your travel day.*

PASSPORTS

A passport is required for travel to Spain. Please make sure you and (all) your guest(s) have a valid passport. This includes children and infants of any age. Please check the expiration date on your passport and make sure it does not expire prior to your return home. (It is a good idea to have at least 6 months of validity left on your passport after the date of your return home.) If you or your guest(s) do not have a passport, please contact your local post office, or **HTTP://TRAVEL.STATE.GOV/PASSPORT/**, **as soon as possible**, for information on how to obtain one. Expedited service should be requested for an additional \$76.00. *The expense of obtaining or renewing a passport with expedited service (\$76.00 additional fee, plus cost of express mail) for yourself and one guest is expensable. Expenses for Excalibur must be expensed under the 'Miscellaneous' tab, account number 711260.*

IF YOU OR YOUR GUEST ARE NOT US CITIZENS

If you or your guest are not US citizens, please contact your nearest Spanish Consulate for information regarding additional documentation that might be required to enter Spain. In addition, you may need a green card, visa or other documentation to re-enter the US after the Excalibur trip. Please make sure you know what documentation is required and be sure to carry it with you.

DIETARY RESTRICTIONS OR PHYSICAL CHALLENGES

If you or your guest have any dietary restrictions (i.e. food allergies, vegetarian meals, etc...) or physical challenges (i.e. wheelchair, etc...) please be sure to inform The Meeting Group agent who is making your travel arrangements.

TRANSPORTATION WHEN YOU ARRIVE IN MADRID

Transportation from Madrid Barajas International Airport to the Westin Palace Madrid will be arranged for you on arrival day, April 13. Further details will be sent with your tickets.

ACCOMMODATIONS

In Madrid, you will be staying at the Westin Palace Madrid, a classic European luxury hotel.

Westin Palace Madrid

Plaza de las Cortes, 7

28014 Madrid, Spain

Phone (from the US dial): 011-34-91-360-8000

Guest Fax (from the US dial): 011-34-91-360-8100

April 13-16, 2008

Hotel check-in time in Madrid is 3:00 pm. Please be aware that your room will most likely not be available if you arrive earlier than 3:00 pm. Your luggage will be stored until your room is ready.

In Barcelona, you will be staying at the Hotel Arts, a Ritz-Carlton Hotel, located in the Olympic Village area of the city, near the sea.

Hotel Arts Barcelona

Marina, 19-21

08005 Barcelona, Spain

Phone (from the US dial): 011-34-93-221-1000

Guest Fax (from the US dial): 011-34-93-221-1070

April 16-19, 2008

ACTIVITIES

In late February, you will receive an activity email with detailed information regarding the various activities offered. At that time, please review the information and discuss the options with your guest. If you would like to try to sign up for some of the same activities as your friends, please discuss the options with them. Sign-up for the activities will take place on the TAP Intranet in early March. Activity selections should be provided to Michele Garbie by anyone who does not have access to the system utilizing an individual TAP computer. Additional information will be forwarded separately regarding activities.

Please be aware that once you sign up for an activity, TAP pays to reserve your place. If you change your mind and cancel an activity after signing up, you will be charged for the cost of that activity, *regardless of whether you find someone to take your place*. Keep in mind how much or how little of your time you want to commit to planned activities.

Activities are set up exclusively for the Excalibur winner and one guest. You will be unable to sign up additional guests (children or adults) for activities. If space becomes available, additional guests may be able to join an activity at your expense. (This applies only to activities. Only one guest is invited to attend the Welcome Reception and the Winners

EXHIBIT "3"

EXCALIBUR

April 13-16, 2008 - Madrid
April 16-19, 2008 – Barcelona

SCHEDULE OF EVENTS

SATURDAY, APRIL 12, 2008

All Day and Evening

Depart the USA

SUNDAY, APRIL 13, 2008 - MADRID

Morning/Afternoon

Arrival in Madrid

Buffet Brunch

Evening

Optional Orientation Walking Tour

Welcome Reception at the Westin Palace Madrid

MONDAY, APRIL 14, 2008 - MADRID

Morning

Excalibur Breakfast Buffet

Morning/Afternoon

Pre-Selected Activity (Full and Half Day Options)

Evening

Dinner at Leisure

TUESDAY, APRIL 15, 2008 - MADRID

Morning

Excalibur Breakfast Buffet

Morning/Afternoon

Pre-Selected Activity (Full and Half Day Options)

Evening

Dinner at Leisure

WEDNESDAY, APRIL 16, 2008 - MADRID & BARCELONA

Morning

Excalibur Breakfast Buffet in Madrid

Morning/Afternoon

Travel from Madrid to Barcelona

Afternoon

Optional Shuttle to Spanish Village in Barcelona

Evening

Optional Dinner & Flamenco Show Or Dinner at Leisure in Barcelona

THURSDAY, APRIL 17, 2008 - BARCELONA

Morning

Excalibur Breakfast Buffet

Morning/Afternoon

Pre-Selected Activity (Full and Half Day Options)

8:00 pm

Winners Gala at the Museu Nacional d'Art de Catalunya (MNAC)

Photos of winner with their guest will be taken.

FRIDAY, APRIL 18, 2008 - BARCELONA

Morning

Excalibur Breakfast Buffet

Morning/Afternoon

Pre-Selected Activity (Full and Half Day Options)

Evening

Optional Dinner & Flamenco Show Or Dinner at Leisure

SATURDAY, APRIL 19, 2008 - BARCELONA

Morning

Excalibur Breakfast Buffet

All Day

Departures to USA

**Information for the various activities being offered will be included in
the activity email that you will receive in late February.**

EXHIBIT "4"

Paola M. Armeni

From: Steve Schwartz [sceezo@aol.com]
Sent: Friday, February 15, 2008 12:43 PM
To: Paola M. Armeni
Cc: sigp3912@yahoo.com
Subject: Ian Mendelsohn

I write to you on behalf of Mr. Ian Mendelsohn and the possibility of him accompanying his fiancée Susan on a trip overseas to Spain.

I have been meeting with Ian and Susan during the last year in the course of her conversion to Judaism. Ian has been with Susan at our monthly meetings, and attending class with her on a weekly basis as well. He has shown himself to be an honest, responsible, and supportive person throughout our meetings. He has been completely open and honest with me about his current situation and status, and is determined to resolve the situation under the requirements of law. My sense is he acknowledges and understands any mistakes he may have made in the past and is looking forward to a bright future with Susan.

I believe he is in no way a threat to leave the country and not return - his home and his family are here in the Baltimore area, as is his business. His family has been part of our congregation for many years, and Ian himself grew up in our midst. He plans to raise his own family in this area and to continue to be connected to our synagogue in the future.

Please feel free to call me if you have any questions.

Rabbi Steve Schwartz
Beth El Congregation
410 - 484 - 0411
sceezo@aol.com

EXHIBIT "5"

Current Psychiatric Status Of Ian Mendelsohn – February 1, 2008

I first saw Ian Mendelsohn for psychiatric consultation on May 26, 2006. I have continued to provide psychiatric treatment on a one time per week basis since then.

It is my impression that, in that time, Ian has made considerable progress in being able to be in touch with his feelings and to communicate with and about them as opposed to withdrawing and becoming utterly incommunicative. In particular, he has become more to stand up for what he needs and to be a better advocate for himself. This had been a large problem. There has been no drug use during this time.

In terms of his situation in the world, Ian has made significant progress. He has a stable relationship with his fiancée, with the two planning to wed in the near future. He has been in close touch with his family of origin and has gotten to know his parents and sister much better and more realistically, a process that has involved its sorrows, too. Ian has stayed in relationship and expressed his own point of view.

There has been friction, especially with his mother around business issues, but Ian has managed this appropriately. Ian has been hard at work developing the wine business that he and his family are building. Ian has also managed being under court mandated supervision realistically and well, a task that is not easy.

Ian's mental status is good. He is alert and oriented in all three spheres. His sensorium is clear, with no hallucinations. His associations are tight. He is not delusional. His mood tends to be anxious rather than depressed. There is no hint of manic elevation. There is neither suicidal nor homicidal ideation. He is invested in his life as it actually is, with worry about the possibility of having to go to prison and continuing shamed self-reproach about being in this predicament. He has periodic trouble sleeping, mostly due to worry.

My impression of Ian Mendelsohn is that he is a person who is developing and maturing as he handles a difficult situation quite appropriately. He has made good progress since I first met him. I do not believe he is a danger either to himself or to anyone else. There are to my mind no indications of pedophilia or of Ian's being a sexual predator.

It is my impression that, if granted the privilege of traveling outside the country with his fiancée for a few weeks, Ian would return as scheduled, for his family is here, his home is here, his business is here, his future is here. In short, his life is here and he will not desert it.

Roger A. Lewin, M.D.

EXHIBIT "6"

National Institute for the Study, Prevention and Treatment of Sexual Trauma

104 B. Biddle Street
Baltimore, MD 21202
Phone: (410) 539-1661

Fax: (410) 539-1664
e-mail address:
fredsberlinmd@comcast.net

Director
Fred S. Berlin BS MA MD PhD PA

Therapists
Lyndyl Blair, LCSW-C
Phyllis Burke, MA, LPC
Richard Feldman, LCSW-C
John Brock MA MCG, LPC, RPA
Nancy Kluge PhD
Daniel Marshall JD MA
Mitesh Mishra, BS, MS, PA
Tracy Nid BSW MA MSW
Kate Thomas PhD

Clinical Affiliates
Shelly Lurie MS, MN, CS-P
H. Martin Mallin PhD, FACS

Chief Administrator
Dana Sawyer

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February 20, 2008

The Honorable Magistrate Peggy Leen
333 Las Vegas Blvd. South
Las Vegas, Nevada 89101

RE: Ian Mendelsohn

Dear Magistrate Leen:

I am writing this letter on behalf of the above-noted individual. As you may be aware, I have been seeing Mr. Mendelsohn on a regular basis since his initial evaluation here on April 17, 2007. He has been fully cooperative and in complete compliance with the treatment program. In my professional opinion, he is in no way whatsoever a flight risk, and he does not constitute a risk to children, or to anyone else in the community. I am, therefore, in full support of his honeymoon trip to Spain.

I trust that this information will prove useful. Should you require any additional information at this time, please do not hesitate to let me know. Thank you very much.

Sincerely,

Fred S. Berlin

Fred S. Berlin, M.D., Ph.D.
Associate Professor, The Johns Hopkins University
School of Medicine
Founder, The Johns Hopkins Sexual Disorders Clinic
Director, National Institute for the Study, Prevention and
Treatment of Sexual Trauma

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